## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

Criminal No. 4:15-CR-151-O

TONYA BLACKWOOD (03) CHARLES DEEDS (09) BRIAN HARRIS (11) WINFRED MORGAN TRAMMEL (22)

## NOTICE OF EXPERT TESTIMONY

## TO THE HONORABLE REED O'CONNOR, U.S. DISTRICT JUDGE:

The United States of America in its Notice of Expert Testimony, and would respectfully show this Court as follows:

The government expects to call DEA Agent Brian Finney, or another qualified expert, to testify from his expertise on techniques and processes unique to drug trafficking, including but not limited to the use of coded language.

Respectfully Submitted,

JOHN R. PARKER UNITED STATES ATTORNEY

/s/ Shawn Smith

SHAWN SMITH
Assistant United States Attorney
State Bar of Texas No. 24033206
801 Cherry Street, Unit #4
Burnett Plaza, Suite 1700
Fort Worth, TX 76102-6897

Telephone: 817-252-5200 Facsimile: 817-252-5455

E-mail: shawn.smith2@usdoj.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 24, 2015, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Shawn Smith

SHAWN SMITH
Assistant United States Attorney